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Federal Communications Commission
Office of Secretary

The Honorable William J. Clinton
President of the United States
The White House
1600 Pennsylvania Avenue, N.W.
Washington, DC 20500

Dear Mr. President:

The Association of Public-Safety Communications Officials International, Inc. (APCO), the nation's oldest and largest public safety communications organization with over 12,000 members involved in the management and operations of public safety communications services nationwide, would like to take this opportunity to respond to your July 23 proposal to establish a national community policing number, and also to offer APCO's assistance in investigating the feasibility of implementing this concept nationwide.

The responsibility for planning, management, operation and financial support of public safety communication centers currently rests with local and state governments. In our view, there are many significant issues which must be carefully considered and evaluated prior to the establishment and addition of a national public safety non-emergency number. A brief listing of but some of those issues is shown below in no particular order of priority:

- **9-1-1 and 7-Digit Non-emergency numbers exist now.**
Public safety agencies throughout the United States currently maintain both 9-1-1 and seven-digit non-emergency telephone numbers.
- **9-1-1 is not yet universal.**
9-1-1 is not available throughout the entire United States. Prior to the implementation of any additional nationwide non-emergency telephone number, support should be given to providing universal access to 9-1-1.
- **System Support required.**
Local governments currently not only manage the operation of public safety communication centers but also support the maintenance of associated equipment and other required services as well. The implementation of an

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additional non-emergency telephone number requires consideration of equipment maintenance, call routing systems and database development and the availability for the overall financial support for such a system.

- **Technology.**

Technology is constantly changing within public safety communications, and the wireless revolution is such an example. The wireless infrastructures are not completely developed for 9-1-1 capabilities and the addition of a national non-emergency telephone number may significantly increase the complexities and cost of such system design.

- **Staffing and Public Education.**

Typically the issues behind "overburdened" 9-1-1 systems are not a congestion problem of the telephone system, they are the lack of personnel support needed in order to adequately handle the incoming call volume, and/or the lack of public education as to the proper use of 9-1-1. Implementation of additional numbers will in most instances occur in the same communications centers that currently answer 9-1-1 and seven digit numbers. Thus before such additional services are implemented, local government must consider the staffing needs of 9-1-1 centers, the community's use of 9-1-1 and the resulting demand on their resources.

- **Funding.**

Funding of telecommunications systems within a community is a local government requirement. Unfunded mandates place an undue burden on local government.

- **Limited in Scope.**

A current national proposal (1-800-379-COPS) is only aimed at law enforcement. Fire and Emergency Medical Services (EMS) are equally important components of public safety communications and should not be overlooked. Additionally, as previously stated, the proposed concept would not only impact on wireline telephone systems but all wireless systems as well.

- **Local Control.**

Local governmental entities require flexibility for determining their community's needs. Thus any change in system design should be determined by local government.

- **Regulatory Proceedings.**

Regulatory proceedings that address the establishment of N-1-1 number assignments are currently in progress at both state and federal levels. Consideration for these proceedings should be respected, as they should consider the complex issue of this subject and allow for consistent state and federal policy on number assignment.

Mr. President, your proposal, and the national exposure it has received, opens a window of opportunity for this idea to be fully explored. If however, it is implemented without the careful examination and debate it deserves, the public may suffer from even poorer service and the proposed solution could add to the very problem it is trying to solve. Therefore we urge careful consideration before proceeding further.

In view of the above, APCO would like to request formal involvement and participation in any further discussions or consideration related to the establishment of any national non-emergency telephone number. In fact, given the appropriate financial support, we would welcome the opportunity to take a leadership role by chairing a national ad-hoc task force on this issue. We propose this be done in cooperation with our fellow public safety associations, the telephone industry, and the public at large, with representation from such organizations as the National Emergency Number Association (NENA), the National Association of State Nine-One-One Administrators (NASNA), the International Association of Chiefs of Police (IACP), the International Association of Fire Chiefs (IAFC), the U.S. Telephone Association (USTA), the National Exchange Carrier Association (NECA), the Cellular Telephone Industry Association (CTIA), the Personal Communications Industry Association (PCIA), the American Automobile Association (AAA), and the American Association of Retired People (AARP).

On behalf of APCO's 12,000 members nationwide, I would like to thank you for your consideration of our concerns and hope that you look favorably on our request. Should your staff need additional information concerning our offer in this matter, please contact our Executive Director, Mr. Ronnie Rand, at (888) APCO-9-1-1.

Respectfully,



Marilyn Ward
President

cc: The Honorable Janet Reno, U.S. Attorney General
The Honorable Reed Hundt, Chairman, Federal Communications
Commission
President of NENA, NASNA, IACP, IAFC
Executive Director of AAA, AARP
Office of Community Policing, NIJ